

# Distribution Integrity Management Program (DIMP)

## Operator of Gas Distribution System

Tamms

Operator ID: **19070**  
Operator: **TAMMS MUNICIPAL GAS SYSTEM, VILLAGE OF**  
Address: **CITY HALL, FRONT & RUSSELL STREET, TAMMS, IL 62988**  
**(618) 747-2353**

Inspection ID: **24**  
Report Date: **5/29/2014**  
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States(s) included in this Inspection:

**Illinois**

### Agency Representatives:

Matt Smith, Illinois Commerce Commission, 2177200291,  
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### Persons Interviewed:

Sam Davis, Gas Superintendent, 6187472353,  
tamms1092@yahoo.com

### Inspector Comments:

Q. No.:	Rule Name:	Question	Answer	Details	Comments
1	192.1005	Was the plan written and implemented per the requirement of 192.1005 by 08/02/2011?  OR  For a gas system put into service or acquired after 08/02/2011, was a plan written and implemented prior to beginning of operation?	Yes or Satisfactory	Staff reviewed the initial DIMP plan that was dated 8/2/2011.	
2	Information Only	Were commercially available product(s)/templates used in the development of the operator's written integrity management plan?  Commercial product(s)/templates name if used:	Yes or Satisfactory  Fully	SHRIMP	
3	Information Only	Does the operator's plan assign responsibility, including titles and positions, of those accountable for developing and implementing required actions?	Yes or Satisfactory	The information is located in Chapter 1.1.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
4	192.1007(a)(1)	Do the written procedures identify or reference the appropriate sources used to determine the following characteristics necessary to assess the threats and risks to the integrity of the pipeline:			
information is			Design (e.g. type of construction,	Yes or Satisfactory	The
		inserted pipe, rehabilitated pipe method, materials, sizes, dates of installation, mains and services, etc.)?			located in Chapter 3.
		Operating Conditions (e.g. pressure, gas quality, etc.)?	Yes or Satisfactory		The information is located in Chapter 3.
		Operating Environmental Factors (e.g. corrosive soil conditions, frost heave, land subsidence, landslides, washouts, snow damage, external heat sources, business districts, wall-to-wall paving, population density, difficult to evacuate facilities, valve placement, etc.)?	Yes or Satisfactory		The information is located in Chapter 3.
5	192.1007(a)(2)	Do the written procedures require the consideration of information gained from past design, operations, and maintenance (e.g. O&M activities, field surveys, One-Call system information, excavation damage,	Yes or Satisfactory		The information is located in Chapter 3.
6	Information Only	Do the written procedures indicate if the information was obtained from electronic records, paper records, or subject matter expert knowledge (select all which apply)?	Paper - SME		Chapter 3 included paper records along with three SME's were used in the development of the plan.
		Electronic, Paper, SME			
7	192.1007(a)(3)	Does the plan contain written procedures to identify additional information that is needed to fill gaps due to missing, inaccurate, or incomplete records?	Yes or Satisfactory		The information is located in Chapter 11.1. C. a.
8	192.1007(a)(3)				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Does the plan list the additional information needed to fill gaps due to missing, inaccurate, or incomplete records?	Yes or Satisfactory	Chapter 11.1. C. a. requires a DIMP Corrections Form will be filled out and filed to include the new information into the current DIMP plan.	
9	192.1007(a)(3)	Do the written procedures specify the means to collect the additional information needed to fill gaps due to missing, inaccurate, or incomplete records (e.g., O&M activities, field surveys, One-Call System, etc.)?	Yes or Satisfactory	Chapter 11.1. C. a. requires Village of Tamms employees to collect the additional information whenever a discrepancy is discovered either in the field or through a records review.	
10	192.1007(a)(5)	Do the written procedures require the capture and retention of data on any new pipeline installed?	Yes or Satisfactory	Chapter 3 lists the requirement that all newly installed pipe will be entered on a Main and Service Installation form included into DIMP.	
11	192.1007(a)(5)	Does the data required for capture and retention include, at a minimum, the location where the new pipeline is installed and the material from which it is constructed?	Yes or Satisfactory	Staff reviewed the Main and Service Installation form and it contains the required information.	
12	192.1007(a)	Does the documentation provided by the operator demonstrate implementation of the element "Knowledge of the System"?	Yes or Satisfactory	Tamms uses SHRIMP and Staff reviewed a portion of the answers used to populate SHRIMP. Staff reviewed patrolling records, corrosion records, leak survey, and atmospheric corrosion records.	
13	192.1007(a)				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Has the operator demonstrated an understanding of its system?	Yes or Satisfactory	Staff discussed with Sam Davis, Gas Superintendent, various aspects of the natural gas system in Tamms.	
14	192.1007(b)	In identifying threats, do the written procedures include consideration of the following categories of threats to each gas distribution pipeline?			
		Corrosion	Yes or Satisfactory	The information is located in Chapter 4.2.1.	
		Natural Forces	Yes or Satisfactory	The information is located in Chapter 4.2.6.	
		Excavation Damage	Yes or Satisfactory	The information is located in Chapter 4.2.3.	
		Other Outside Force Damage	Yes or Satisfactory	The information is located in Chapter 4.2.7.	
		Material or Welds	Yes or Satisfactory	The information is located in Chapter 4.2.5.	
		Equipment Failure	Yes or Satisfactory	The information is located in Chapter 4.2.2.	
		Incorrect Operation	Yes or Satisfactory	The information is located in Chapter 4.2.4.	
		Other Concerns	Yes or Satisfactory	The information is located in Chapter 4.2.8.	
15	192.1007(b)	Did the operator consider the information that was reasonably available to identify existing and potential threats?	Yes or Satisfactory	Staff reviewed the list of records used in Chapter 4 to identify existing and potential threats.	
16	Information Only	Does the plan subdivide the primary threats into subcategories to identify existing and potential threats?	Yes or Satisfactory	In Chapter 4, primary threats are subdivided into subcategories of threats.	
17	192.1007(b)				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Incident and leak history	Yes or Satisfactory		
		Corrosion control records	Yes or Satisfactory		
		Continuing surveillance records	Yes or Satisfactory		
		Patrolling records	Yes or Satisfactory		
		Maintenance history	Yes or Satisfactory		
		Excavation damage experience	Yes or Satisfactory		
		Other – Describe	Yes or Satisfactory	DOT Reports, Leak  Survey Records,  DOT Reports, Leak Survey records, Leak Complaint records, Exposed Pipe Inspections, Leak Repair records, Pipeline Patrol records, and	
		In identifying threats did the information considered include any of the following?	Yes or Satisfactory	The following records are listed throughout Chapter 4.	
18	Information Only	Does the plan categorize primary threats as either “system-wide” or “localized”?	Some of Both	Most of the threats are system wide because that type of pipe or material is located throughout the system.	Most of the threats are system wide because that type of pipe or material is located throughout the system.
19	Information Only	Do the written procedures consider, in addition to the operator’s own information, data from external sources (e.g. trade associations, government agencies, or other system operators, etc.) to assist in identifying potential threats?	Yes or Satisfactory	Village of Tamms lists PHMSA Advisory Bulletins, PHMSA Annual and Incident Report data, Data on leak repair rates from all SHRIMP users provided by APGA SIF, American Gas Association, American Public Gas Association, and Midwest Energy Association.	
20	192.1007(b)				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Does the documentation provided by the operator demonstrate implementation of the element "Identify Threats"?	Yes or Satisfactory	The information is located in Chapter 11.2.	
21	Information Only	Was the risk evaluation developed fully or in part using a commercially available tool?	Fully	SHRIMP	
		Commercial tool name if used:			
22	192.1007( c )	Do the written procedures contain the method used to determine the relative importance of each threat and estimate and rank the risks posed? Briefly describe the method.	Yes or Satisfactory	Tamms uses SHRIMP. The Relative Risk Model is located in Chapter 11.3.2.	
23	192.1007( c )	Do the written procedures to evaluate and rank risk consider:			
		Each applicable current and potential threat?			
		Corrosion	Yes or Satisfactory	The information is located in Chapter 11.3.	
		Natural Forces	Yes or Satisfactory	The information is located in Chapter 11.3.	
		Excavation Damage	Yes or Satisfactory	The information is located in Chapter 11.3.	
		Other Outside Force Damage	Yes or Satisfactory	The information is located in Chapter 11.3.	
		Material or Welds	Yes or Satisfactory	The information is located in Chapter 11.3.	
		Equipment Failure	Yes or Satisfactory	The information is located in Chapter 11.3.	
		Incorrect Operation	Yes or Satisfactory	The information is located in Chapter 11.3.	
		Other Concerns	Yes or Satisfactory	The information is located in Chapter 11.3.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
24	192.1007( c )	Do the written procedures to evaluate and rank risk consider:  The likelihood of failure associated with each threat?			
		Corrosion	Yes or Satisfactory	The information is located in Chapter 11.3.	
		Natural Forces	Yes or Satisfactory	The information is located in Chapter 11.3.	
		Excavation Damage	Yes or Satisfactory	The information is located in Chapter 11.3.	
		Other Outside Force Damage	Yes or Satisfactory	The information is located in Chapter 11.3.	
		Material or Welds	Yes or Satisfactory	The information is located in Chapter 11.3.	
		Equipment Failure	Yes or Satisfactory	The information is located in Chapter 11.3.	
		Incorrect Operation	Yes or Satisfactory	The information is located in Chapter 11.3.	
		Other Concerns	Yes or Satisfactory	The information is located in Chapter 11.3.	
25	192.1007( c )	Do the written procedures to evaluate and rank risk consider:  The potential consequence of such a failure?			
		Corrosion	Yes or Satisfactory	The information is located in Chapter 11.3.	
		Natural Forces	Yes or Satisfactory	The information is located in Chapter 11.3.	
		Excavation Damage	Yes or Satisfactory	The information is located in Chapter 11.3.	
		Other Outside Force Damage	Yes or Satisfactory	The information is located in Chapter 11.3.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Material or Welds	Yes or Satisfactory	The information is located in Chapter 11.3.	
		Equipment Failure	Yes or Satisfactory	The information is located in Chapter 11.3.	
		Incorrect Operation	Yes or Satisfactory	The information is located in Chapter 11.3.	
		Other Concerns	Yes or Satisfactory	The information is located in Chapter 11.3.	
26	192.1007( c )	If subdivision of system occurs, does the plan subdivide the system into regions with similar characteristics and for which similar actions are likely to be effective in reducing risk? Briefly describe the approach.	Yes or Satisfactory	Due to the small nature of Tamms' distribution system, most threats are located throughout the system. A few of the threats were specific to the area the threat was identified.	
27	Information Only	Is the method used to evaluate and rank risks reasonable?	Yes or Satisfactory	Staff reviewed Chapter 11.3.2, Relative Risk Model, which contains the method to evaluate and rank risks.	
28	192.1007( c )	Are the results of the risk ranking supported by the risk evaluation model/method?	Yes or Satisfactory	Staff reviewed the risk ranking and compared the weighting factors to the Relative Risk Model.	
29	192.1007( c )	Did the operator validate the results generated by the risk evaluation model/method? Briefly describe.	No or Unsatisfactory	Tamms did not rank threats related to Other Outside Force Damage or Incorrect Operations.	Issued a Notice of Amendment for failure to rank the risk of all various threats.
30	192.1007( c )				



Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Does the documentation provided by the operator demonstrate implementation of the element "Evaluate and Rank Risk"?	No or Unsatisfactory	As stated in Question 29, Tamms failed to rank all of the threats in their system.	Staff will issue a NOA as stated in Question 29.
31	192.1007 (d)	Does the plan include procedures to identify when measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk?	Yes or Satisfactory	The information is located in Chapter 11.3.d.	
32	192.1007 (d)	When measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk, does the plan identify the measures selected, how they will be implemented, and the risks they are addressing?	Yes or Satisfactory	The information is located in Chapter 11.5.2.	
34	192.1007 (d)	Locate the leaks in the distribution system;	Yes or Satisfactory	Chapter 6.1 refers to the O&M Sections 13 Part C or Section 2 Parts I & J.	
		Evaluate the actual or potential hazards associated with these leaks;	Yes or Satisfactory	Chapter 6.1 refers to the O&M Section 13 Parts D & E.	
		Act appropriately to mitigate these hazards;	Yes or Satisfactory	The leak classification and action criteria outlined by GPTC stipulates the steps to be taken when either a Class 1, 2, or 3 leak is discovered.	
		Keep records;	Yes or Satisfactory	Chapter 6.1 requires the records to be retained for 10 years.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Self-assess to determine if additional actions are necessary to keep people and property safe.	Yes or Satisfactory	Tamms uses GPTC guidelines for classifying leaks. Considering the number of underground leaks are very low for Tamms, when an underground leak is discovered the gas personnel discuss the leak and evaluation of the leak is considered by all employees.	
		Does the plan include an effective leak management program (unless all leaks are repaired when found)	Yes or Satisfactory		
35	192.1007 (d)	Does the documentation provided by the operator demonstrate implementation of the measures, required by Part 192 Subpart P, to reduce risk?	Yes or Satisfactory	Tamms listed that excavation activities will be monitored. When leaking PVC is discovered it will be replaced with PE pipe.	
36	192.1007 (e)	Does the plan contain written procedures for how the operator established a baseline for each performance measure?			
		i) Number of hazardous leaks either eliminated or repaired, categorized by cause?	Yes or Satisfactory	The information is located in Chapter 11.3.e.	
		ii) Number of excavation damages?	Yes or Satisfactory	The information is located in Chapter 11.3.e.	
		iii) Number of excavation tickets received by gas department?	Yes or Satisfactory	The information is located in Chapter 11.3.e.	
		iv) Total number of leaks either eliminated or repaired categorized by cause?	Yes or Satisfactory	The information is located in Chapter 11.3.e.	
		v) Number of hazardous leaks either eliminated or repaired, categorized by material?	Yes or Satisfactory	The information is located in Chapter 11.3.e.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat?	Yes or Satisfactory	The information is located in Chapter 11.3.e.	
37	192.1007 (e)	Does the plan establish a baseline for each performance measure?			
		i) Number of hazardous leaks either eliminated or repaired, categorized by cause?	Yes or Satisfactory	The information is located in Chapter 7.1.	
		ii) Number of excavation damages?	Yes or Satisfactory	The information is located in Chapter 7.1.	
		iii) Number of excavation tickets received by gas department?	Yes or Satisfactory	The information is located in Chapter 7.1.	
		iv) Total number of leaks either eliminated or repaired categorized by cause?	Yes or Satisfactory	The information is located in Chapter 7.1.	
		v) Number of hazardous leaks either eliminated or repaired, categorized by material?	Yes or Satisfactory	The information is located in Chapter 7.1.	
		vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat?	Yes or Satisfactory	The information is located in Chapter 7.1.	
38	192.1007 (e)	Does the operator have written procedures to collect the data for each performance measure?			
		i) Number of hazardous leaks either eliminated or repaired, categorized by cause?	Yes or Satisfactory	The information is located in Chapter 7.1.	
		ii) Number of excavation damages?	Yes or Satisfactory	The information is located in Chapter 7.1.	
		iii) Number of excavation tickets received by gas department?	Yes or Satisfactory	The information is located in Chapter 7.1.	
		iv) Total number of leaks either eliminated or repaired categorized by cause?	Yes or Satisfactory	The information is located in Chapter 7.1.	
		v) Number of hazardous leaks either eliminated or repaired, categorized by material?	Yes or Satisfactory	The information is located in Chapter 7.1.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat?	Yes or Satisfactory	The information is located in Chapter 7.1.	
39	192.1007 (e)	Do the written procedures require the operator to monitor each performance measure?			
		i) Number of hazardous leaks either eliminated or repaired, categorized by cause?	Yes or Satisfactory	The information is located in Chapter 7.1.	
		ii) Number of excavation damages?	Yes or Satisfactory	The information is located in Chapter 7.1.	
		iii) Number of excavation tickets received by gas department?	Yes or Satisfactory	The information is located in Chapter 7.1.	
		iv) Total number of leaks either eliminated or repaired categorized by cause?	Yes or Satisfactory	The information is located in Chapter 7.1.	
		v) Number of hazardous leaks either eliminated or repaired, categorized by material?	Yes or Satisfactory	The information is located in Chapter 7.1.	
		vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat?	Yes or Satisfactory	The information is located in Chapter 7.1.	
40	192.1007 (e)	When measures are required to reduce risk, do the written procedures provide how their effectiveness will be measured?	Yes or Satisfactory	The information is located in Chapter 7.2.	
41	Information Only	Can the performance measures identified by the operator in the plan be counted, monitored, and supported?	Yes or Satisfactory		
42	192.1007 (e)	Does the documentation provided by the operator demonstrate implementation of the element "Measure Performance, Monitor Results, and Evaluate Effectiveness"?	Yes or Satisfactory	Staff reviewed the previous two years of Annual Reports and determined the baselines were not increased above the limits stated in the DIMP.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
43	192.1007 (f)	Do the written procedures for periodic review include:			
8 requires a		a.	Frequency of review based on	Yes or Satisfactory	Chapter
		the complexity of the system and changes in factors affecting the risk of failure, not to exceed 5 years?		review of the DIMP annually.	
		b. Verification of general information (e.g. contact information, form names, action schedules, etc.)?	Yes or Satisfactory	The requirement is located in Chapter 8.	
		c. Incorporate new system information?	Yes or Satisfactory	The requirement is located in Chapter 8.	
		d. Re-evaluation of threats and risk?	Yes or Satisfactory	The requirement is located in Chapter 8.	
		e. Review the frequency of the measures to reduce risk?	Yes or Satisfactory	The requirement is located in Chapter 8.	
		f. Review the effectiveness of the measures to reduce risk?	Yes or Satisfactory	The requirement is located in Chapter 8.	
requirement is		g.	Modify the measures to reduce	Yes or Satisfactory	The
		risk and refine/improve as needed (i.e. add new, modify existing, or eliminate if no longer needed)?		located in Chapter 8.	
requirement is		h.	Review performance measures,	Yes or Satisfactory	The
		their effectiveness, and if they are not appropriate, refine/improve them?		located in Chapter 8.	
44	Information Only	Does the plan contain a process for informing the appropriate operating personnel of an update to the plan?	Yes or Satisfactory	The information is located in Chapter 11.1 C. a.	
45	Information Only	Does the plan contain a process for informing the appropriate regulatory agency of a significant update to the plan?	Yes or Satisfactory	In the Revisions section there is a requirement when any changes are made to the plan then a copy will be forwarded to the Illinois Commerce Commission.	
46	192.1007 (f)	Does the documentation provided by the operator demonstrate implementation of the element "Periodic Evaluation and Improvement"?	Yes or Satisfactory	The periodic evaluation information is located in the Revisions History page.	
47	192.1007 (g)				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Does the plan contain or reference procedures for reporting, on an annual basis, the four measures listed in 192.1007(e)(1)(i) through (e)(1)(iv) to PHMSA as part of the annual report required by § 191.11 and the State regulatory authority?	Yes or Satisfactory	Chapter 9 contains the requirement to submit the annual report data.	
48	Information Only	When required by the State, does the plan identify the specific report form, date, and location where it is to be submitted?	Yes or Satisfactory	Chapter 9 contains the requirement to submit the required forms (by number) to PHMSA and the	
49	192.1007 (g)	Has the operator submitted the required reports?	Yes or Satisfactory		
50	192.1009	Does the operator have written procedures to collect the information necessary to comply with the reporting requirements of 192.1009?	Yes or Satisfactory	Chapter 9 contains the requirement to collect the necessary information to populate the requirement as established by 192.1009.	
51	192.1011	Does the operator have written procedures specifying which records demonstrating compliance with Subpart P will be maintained for at least 10 years?	Yes or Satisfactory	Chapter 10 contains the requirement that all records will be maintained for 10 years.	
52	192.1011	Does the operator have written procedures specifying that copies of superseded integrity management plans will be maintained for at least 10 years?	Yes or Satisfactory	Chapter 10 contains the requirement that all superseded plans will be maintained for 10 years.	
53	192.1011				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Has the operator maintained the required records?	Yes or Satisfactory	Staff reviewed that all previous versions of the plan have been maintained. Staff also discussed that all records used to populate the DIMP plan must be maintained for 10 years.	
54-1	192.1007 (d)	<p>1. For the top five highest ranked risks from the operator's risk ranking list the following:</p> <p>Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);</p> <p>Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);</p> <p>Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);</p> <p>Associated performance measure.</p>	<p>Excavation damage</p> <p>Third party</p>	<p>Conduct pre-construction meetings</p> <p>Track the frequency of these failures per 1000 tickets.</p>	
54-2	192.1007 (d)	<p>2. For the top five highest ranked risks from the operator's risk ranking list the following:</p> <p>Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);</p> <p>Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);</p> <p>Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);</p> <p>Associated performance measure.</p>	<p>Material or weld or joint failure</p> <p>PVC</p>	<p>Leaking PVC will be removed and replaced with PE pipe.</p> <p>Track the frequency of these failures.</p>	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
54-3	192.1007 (d)	<p>3. For the top five highest ranked risks from the operator's risk ranking list the following:</p> <p>Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);</p> <p>Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);</p> <p>Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);</p> <p>Associated performance measure.</p>	Corrosion	<p>External – steel, coated, CP</p> <p>Cathodic protection deficiencies will be corrected as soon as possible.</p> <p>Track the number of leaks caused by external corrosion per mile of main and per 1000 service lines.</p>	
54-4	192.1007 (d)	<p>4. For the top five highest ranked risks from the operator's risk ranking list the following:</p> <p>Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);</p> <p>Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);</p> <p>Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);</p> <p>Associated performance measure.</p>	<p>Other concerns</p> <p>Other</p>	<p>Over pressurization of system due to failure of the supplying pipeline's regulators.</p> <p>Install an overpressure protection device at the take point.</p> <p>Track the frequency of these failures.</p>	
54-5	192.1007 (d)	<p>5. For the top five highest ranked risks from the operator's risk ranking list the following:</p>			



Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);	Natural forces		
		Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);	Water/Flood		
		Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);		None	
		Associated performance measure.		Track the number of failures due to this threat.	